

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
BALTIMORE DIVISION**

AMERICAN ASSOCIATION OF
COLLEGES FOR TEACHER
EDUCATION, *et al.*,

Plaintiffs,

v.

LINDA MCMAHON,
AS SECRETARY OF EDUCATION, *et al.*,

Defendants.

Civil Action No. 1:25-cv-00702-JRR

**SUPPLEMENTAL DECLARATION OF LAURIE MULLEN, PH.D., IN FURTHER
SUPPORT OF APPLICATION FOR TEMPORARY RESTRAINING ORDER /
PRELIMINARY INJUNCTION**

I, Laurie Mullen, Ph.D., declare and state under penalty of perjury the following:

1. I am the President of Maryland Association of Colleges for Teacher Education (“MACTE”), one of the plaintiffs in this case. I am also the Dean of the College of Education at Towson University.

2. I am over the age of 18, and I am competent in all respects to testify to the matters below. I understand that this Supplemental Declaration is for use in connection with the above-captioned civil action, and I make this Supplemental Declaration based upon my own personal knowledge and my review of the MACTE’s business records.

3. MACTE has ten member organizations, all of which are residents of Maryland.

4. MACTE has three member organizations which were awarded SEED and/or TQP grants which were termination in February 2025, resulting in a substantial loss of funds for teacher preparation programs in Maryland.

5. Specifically, Towson University, the University of Maryland, and Frostburg State University are all member organizations of MACTE.

6. Towson University's TQP grant was terminated in February 2025 by the Department. The TQP grant was approved on September 4, 2024, for a period of one year (October 1, 2024 September 30, 2025), in the amount of \$849,659. Future budget periods were outlined as follows: budget period 2 (10/1/2025 9/30/2026) - \$811,249; budget period 3 (10/1/2026 9/30/2027) - \$1,099,920; budget period 4 (10/1/2027 9/30/2028) - \$1,240,123; budget period 5 (10/1/2028 9/30/2029) - \$1,152,933.

7. The University of Maryland's SEED grant was terminated in February 2025 by the Department. The terminated SEED grant was approved to begin on October 1, 2022, for a period of three years, in the amount of \$4,808,683.

8. Frostburg State University's TQP grant was terminated in February 2025 by the Department.

9. The loss of the funding of the TQP and SEED grants in Maryland for MACTE's member organizations has caused, and will continue to cause, a substantial loss of funds for teacher preparation programs in Maryland.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 12 day of March, 2025

By: Laurie Mullen

Laurie Mullen, Ph.D.